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TRANSCRIPT OF PROCEEDINGS

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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JAN 10 1994

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

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5 IN THE MATTER OF:

6 TRINITY BROADCASTING OF FLORIDA, INC.  
7 and  
8 GLENDALE BROADCASTING COMPANY

MM DOCKET NO. 93-75

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24 Miami, Florida

25 DATE OF HEARING: December 10, 1993

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FREE STATE REPORTING, INC.  
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D.C. Area (301) 261-1902  
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Before the  
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In the matter of: )

TRINITY BROADCASTING OF FLORIDA, INC. )  
and )  
GLENDALE BROADCASTING COMPANY )

Miami, Florida )  
-----)

MM DOCKET NO. 93-75

The above-entitled matter come on for hearing  
pursuant to Notice before Judge Chachkin, Administrative Law  
Judge, at 2000 L Street, N.W., Washington, D.C., in Courtroom  
No. 3, on Friday, December 10, 1993, at 9:30 a.m.

APPEARANCES:

On behalf of Trinity Broadcasting of Florida, Inc.:

NATHANIEL F. EMMONS, Esquire  
CHRISTOPHER HOLT, Esquire  
EUGENE MULLIN, Esquire  
HOWARD TOPEL, Esquire  
Mullin, Rhyne, Emmons and Topel  
1000 Connecticut Avenue, Suite 500  
Washington, D.C.

On behalf of Glendale Broadcasting Company:

LEWIS I. COHEN, Esquire  
JOHN J. SCHAUBLE, Esquire  
Cohen and Berfield, P.C.  
Board of Trade Building  
1129 20th Street, N.W.  
Washington, D.C. 20036

On behalf of the S.A.L.A.D.:

DAVID E. HONIG, Esquire  
DAVID McCURDY, Esquire  
1800 N.W. 187th Street  
Miami, Florida 33056

FREE STATE REPORTING, INC.  
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D.C. Area (301) 261-1902  
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## 1 APPEARANCES (Continued):

2 On behalf of the Mass Media Bureau:

3 JAMES W. SHOOK, Esquire  
4 GARY SCHONMAN, Esquire  
5 Mass Media Bureau  
6 Washington, D.C. 20554  
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## I N D E X

<u>WITNESS</u>	<u>DIRECT</u>	<u>CROSS</u>	<u>REDIRECT</u>	<u>RECROSS</u>
Mr. Hill				
By Mr. Topel	1916		2049	
By Mr. Cohen		1917		2060
By Mr. Shook		1996		
Mrs. Duff				
By Mr. Schonman		2064		

## E X H I B I T S

<u>TRINITY</u>	<u>IDENTIFIED</u>	<u>RECEIVED</u>	<u>REJECTED</u>
Exhibit No. 117	2051	2055	
<u>GLENDAL</u>			
Exhibit No. 217	1952	1953	
Exhibit No. 218	1977		
Exhibit No. 219	1994	1996	

Hearing Began: 9:30 a.m. Hearing Ended: 4:00 p.m.

## P R O C E E D I N G S

(9:30 a.m.)

JUDGE CHACHKIN: On the record -- We have the  
testimony of Reverend Lee at --

MR. TOPEL: Reverend Hill, yes, Your Honor.

JUDGE CHACHKIN: Reverend Hill, I'm sorry.

MR. TOPEL: Yes, Your Honor, I call to the witness  
stand Pastor Edward Victor Hill.

MR. HILL: Good morning, Your Honor.

JUDGE CHACHKIN: Good morning -- would you raise  
your right hand, please? Do you solemnly swear or affirm that  
the testimony you're about to give is the truth, the whole  
truth and nothing but the truth, so help you God?

MR. HILL: I do.

JUDGE CHACHKIN: Thank you. Please be seated and go  
ahead --  
Whereupon,

EDWARD V. HILL

having previously been duly sworn, was called as a witness  
herein and was examined and testified as follows:

## D I R E C T   E X A M I N A T I O N

BY MR. TOPEL:

Q     Sir, would you please state your full name for the  
record?

A     Edward Victor Hill.

Q     And your residence address?

1           A     4325 Enora Drive, Los Angeles.

2           Q     Thank you, sir. Pastor Hill, I'm showing you a  
3 document that has been received into evidence in this  
4 proceeding as Trinity Broadcasting of Florida, Exhibit 102 and  
5 it bears the caption "Testimony of Edward Victor Hill" and I  
6 would like to show you the page that follows page 30 bearing  
7 the title "Supporting Declaration" and can you tell me, sir,  
8 is that your signature on that page?

9           A     Yes.

10          Q     And can you explain to me, for the record, why your  
11 signature appears twice on that page?

12          A     Well, I normally sign Edward V. Hill and I took note  
13 that it was signed Edward Victor Hill and so I signed Edward  
14 Victor Hill also.

15          Q     Thank you. And does this document constitute your  
16 testimony in this Federal Communications Commission  
17 proceeding?

18          A     Yes, it does.

19               MR. TOPEL: Okay, thank you. Your Honor, I believe  
20 the witness is available for cross-examination.

21               JUDGE CHACHKIN: Mr. Cohen, are you going to lead  
22 off?

23               MR. COHEN: Yes, sir, I believe I am, Your Honor.

24               JUDGE CHACHKIN: Go ahead.

25                               CROSS-EXAMINATION

1 BY MR. COHEN:

2 Q Good morning, Pastor Hill.

3 A Good morning.

4 Q First I want to say that I'm sorry that you've been  
5 personally inconvenienced.

6 A That's all --

7 Q I heard yesterday you were going back and forth from  
8 Los Angeles, I'm sorry that that happened to you, sir. Your  
9 Honor, would you instruct the witness on the sequestration  
10 rule?

11 JUDGE CHACHKIN: Yes, there is a rule in force that  
12 you are not to discuss your testimony with any of the  
13 witnesses.

14 MR. HILL: Thank you, sir.

15 BY MR. COHEN:

16 Q Am I correct, Pastor, that you have no knowledge of  
17 the testimony of Jane Duff?

18 A I have not.

19 Q Okay. Pastor, I wanted to ask you just a few  
20 questions about your relationship to Trinity. Am I correct,  
21 sir, that you preach at promotional rallies that TBN has in  
22 cities where TBN had -- strike that. Are you -- am I correct  
23 that you preach at promotional rallies for TBN in cities where  
24 TBN has stations?

25 A Yes.

1 Q And am I right, sir, that you've been a regular  
2 speaker on the road for TBN rallies for the last eight to ten  
3 years?

4 A Yes.

5 Q And am I right, sir, that you were compensated at  
6 different levels by TBN depending on the year?

7 A Yes.

8 Q Now, I'm correct, Pastor, that you consider Dr.  
9 Crouch, Paul Crouch, one of your closest friends.

10 A I do.

11 Q And does that intimate relationship extend not only  
12 to Paul Crouch but to his wife, Jan?

13 A Yes.

14 Q And do you have the same type of close and intimate  
15 relationship with each of his children?

16 A Yes, particular to Paul Crouch, Jr.

17 Q Now, you will recall that you became a board member  
18 of NMTV on October 2, 1991, that's just to help you --

19 A Yes.

20 Q -- that's accurate, is it not? Now --

21 JUDGE CHACHKIN: Is that true?

22 MR. HILL: That's true.

23 JUDGE CHACHKIN: Of course, you have to answer out  
24 loud --

25 MR. HILL: Oh, I'm sorry, yes.



1 JUDGE CHACHKIN: All right.

2 BY MR. COHEN:

3 Q It's just like your deposition, remember, Pastor,  
4 the recorder can't pick up a nod or -- you have to be  
5 affirmative or negative.

6 A Yeah, uh-huh. Yeah.

7 Q Now, when you joined the board of directors as a  
8 director in October 1991, did you know who the directors were?

9 A I was not acquainted at the time that I was asked to  
10 join, I joined the complete board of directors and I was not  
11 knowledgeable of differentiating between some staff members  
12 that I seen heretofore but I do know the board of directors,  
13 yes.

14 Q Now, but when you were deposed, it was your  
15 understanding that Jim McCleallan was a board member.

16 A Yes.

17 Q And you now understand that he's not.

18 A That's right.

19 Q And from whom did you receive the understanding that  
20 he's not?

21 A Well, I under -- I received it from, first of all,  
22 Jim McCleallan. Second of all, I received it from my counsel.

23 Q Now, when you were deposed in Santa Ana on September  
24 29, 1993, it was then your understanding that Mr. McCleallan  
25 was a board member.

1 A Yes.

2 Q And do you recall the meeting that -- when you met  
3 -- the board meeting when you met Mr. McCleallan?

4 A Yes.

5 Q You have that in mind?

6 A Well --

7 Q Just do you recall that meeting, that's I want to  
8 ask you, do you recall the meeting, that's the question?

9 A But that's not when I met Mr. McCleallan.

10 Q You met Mr. -- oh, strike that. Do you have a  
11 recollection of a board meeting at which Mr. McCleallan  
12 attended the board?

13 A Yes.

14 Q That's what -- that's the frame of reference, I  
15 think. And was Paul Crouch's brother Phillip Crouch at that  
16 board meeting?

17 A To my recollection, he was, yes.

18 JUDGE CHACHKIN: Could we establish a date, Mr.  
19 Cohen?

20 MR. COHEN: Your point is very well taken, Your  
21 Honor. The board meeting occurred -- that would be in Mass  
22 Media Bureau, Exhibit 386. Possibly if I can look at that  
23 quickly in my own exhibits. That would be, Your Honor -- no,  
24 I'm in error.

25 MR. SHOOK: It is 386.

1 MR. COHEN: It is 386?  
2 MR. SHOOK: It is.  
3 JUDGE CHACHKIN: It's the annual meeting --  
4 MR. COHEN: It's the 19 --  
5 JUDGE CHACHKIN: -- January 14, 1992, is that what  
6 we're talking about?  
7 MR. COHEN: No, I think I'm --  
8 MR. SCHONMAN: It's volumes.  
9 MR. COHEN: Yes, I guess that's -- well, I don't  
10 know the -- yes, that's -- you're quite right, I was correct,  
11 that's the meeting, yeah, that's the one.  
12 JUDGE CHACHKIN: So you stipulate that's the --  
13 well, let me ask the witness. Is that the --  
14 MR. TOPEL: May I show the witness the exhibit, Your  
15 Honor?  
16 JUDGE CHACHKIN: Sure, go ahead.  
17 MR. HILL: Um-hum, that's the one.  
18 MR. COHEN: Is that the one I'm thinking -- fine,  
19 okay.  
20 MR. TOPEL: 376, sir.  
21 MR. SCHONMAN: 386.  
22 JUDGE CHACHKIN: 386. I just want to establish this  
23 is the board meeting we're talking about.  
24 MR. COHEN: Your point is very well taken, Your  
25 Honor, I should have done that.

1 MR. HILL: Yes.

2 JUDGE CHACHKIN: So we're talking about an annual  
3 meeting of NMTV of -- held on January 14, 1992 at Tustin,  
4 California, is that correct?

5 MR. HILL: Yes.

6 JUDGE CHACHKIN: All right, go ahead, Mr. Cohen.

7 BY MR. COHEN:

8 Q And that's the meeting when you recall that Paul  
9 Crouch's brother Phillip attended.

10 A Yes.

11 Q And in what -- what was his role, as you recall,  
12 that is Phillip's role at the meeting?

13 A As I recall he was among those who are staff members  
14 and advisors and what have you at the board meeting to answer  
15 any questions, to do any going and -- coming and going that  
16 the board might needed at that time.

17 Q And did you understand what -- Phillip Crouch is his  
18 name, is that correct? Or do you -- or did you know his name,  
19 or do you know his name?

20 A I heard refer to him as Mr. Crouch, the brother of  
21 --

22 Q Okay, we'll just refer to him as Mr. Crouch.

23 A Yes.

24 Q Okay, did you have a knowledge then as to what Mr.  
25 Crouch's role was at TBN?

1           A     Well, I knew that he helped with the Texas station  
2 at that particular time and prior to the Texas station that he  
3 worked there in Tustin with that station.

4           Q     And it was your understanding that he attended the  
5 board meeting in the role of a staff person, is that it?

6           A     I would say advisor, staff person, yes.

7           Q     Thank you. Now, I think the record should reflect,  
8 Pastor, in 1992, can you give me your best estimate, and  
9 remembering you came on board in October of 1991, can you give  
10 me your best estimate of how many hours a week or a month that  
11 you would say that you devoted to your duties as a board  
12 member of NMTV?

13          A     Approximately ten hours for the year, for 1992.

14          Q     And would it be a fair statement to say it -- you  
15 would -- it would not exceed ten hours.

16          A     It would not exceed ten hours.

17          Q     And what would your answer be for the same question  
18 for 1993, Pastor?

19          A     It would exceed ten hours, that's this year, yeah.

20          Q     Yeah.

21          A     Yes, we been -- if I take into account deposition  
22 and all it would exceed the ten hours.

23                 JUDGE CHACHKIN: Well, what about board business,  
24 without taking into account depositions?

25                 MR. HILL: It would not exceed ten hours.

1 JUDGE CHACHKIN: All right, go ahead, Mr. --

2 MR. COHEN: Thank you, Your Honor.

3 BY MR. COHEN:

4 Q Now, do you -- you understand, I take it that NMTV  
5 owns a television station, is that correct?

6 A That's right.

7 Q Okay, and that television station is in Portland.

8 A Portland.

9 Q Okay, now, do you also have an understanding, sir,  
10 as to whether NMTV owns any translator stations of low-power  
11 stations?

12 A Yes.

13 Q And it's true that you don't know how many that NMTV  
14 owns, am I correct?

15 A It is my understanding approximately ten.

16 Q Well, at the time your deposition was taken, you  
17 didn't know, did you?

18 A No.

19 JUDGE CHACHKIN: Have we established a date for the  
20 deposition?

21 MR. COHEN: Yes, sir, September 29, 1993, about two  
22 months ago.

23 BY MR. COHEN:

24 Q You didn't know then, did you?

25 A No.

1 Q Now, I want to bring you back to the time that you  
2 became a director of NMTV and that we've agreed is October of  
3 1991. It's true, sir that you understood that Norman Juggert  
4 was NMTV's attorney when you joined the board, is that  
5 correct?

6 A Yes.

7 Q And it's true that when you became a board member of  
8 NMTV it was also your understanding that Mr. Juggert was  
9 Trinity's lawyer, is that correct?

10 A Yes.

11 Q And it's true that you think in your mind it's -- in  
12 your mind NMTV is the child of Trinity, isn't that correct?

13 A Yes.

14 Q Now, you don't have any knowledge at to who's  
15 authorized to sign checks for NMTV, do you?

16 A No, I don't.

17 Q And when you became a director, did you -- you got a  
18 package, you testified you got --

19 A Yes, sir.

20 Q And that was a package that contained helpful  
21 information, is that right?

22 A Yes, sir.

23 Q And do you recall whether that package contained the  
24 articles and by-laws of NMTV?

25 A Yes, I do recall that it did.

1 Q And you received that package, my understanding is,  
2 some time shortly before you became a board member.

3 A That's right.

4 Q And did you have occasion to read the by-laws of  
5 NMTV?

6 A Not in detail, I didn't.

7 Q Well, tell me -- give me your best estimate as to  
8 how much time you've devoted to reading the by-laws of NMTV as  
9 of this minute.

10 A Well, the whole package I would say I spent at least  
11 two hours.

12 Q But it's true, isn't it, that you spent less than  
13 thirty minutes up till the time your deposition was taken  
14 reviewing the by-laws?

15 A Specific by-laws, it probably would have been thirty  
16 minutes but there was more in the package than that.

17 Q And to refresh your recollection, sir, at the  
18 deposition, at Transcript 53 I asked you at line 18, have you  
19 ever had occasion to read them, referring to the by-laws and  
20 you answered, not thoroughly, and I asked you, well, tell me  
21 approximately how much time you devoted to looking at them and  
22 then your answer was less than thirty minutes. Does that  
23 refresh your recollection?

24 A That -- well, as I said, approximately thirty  
25 minutes, yeah.



1           Q     Thank you, that's helpful. Now, you didn't -- you  
2 don't know the authorized number of directors that NMTV can  
3 have, do you?

4           A     Up to ten.

5           Q     You didn't know that at time of your deposition, did  
6 you?

7           A     No.

8           Q     And you don't know what the minimum number of  
9 directors are, do you?

10          A     No, I don't.

11          Q     And you don't know the term of office of each  
12 director, do you?

13          A     No, I don't.

14          Q     And you don't know whether the by-laws provide for  
15 proxies, do you?

16          A     No, I don't.

17          Q     And you don't know whether the by-laws provide for  
18 NMTV having any committees?

19          A     Yes, I do.

20          Q     Well, you didn't know at the time of your  
21 deposition.

22          A     Yes, I would.

23          Q     Well, I -- page 55 of your deposition, sir, line 20,  
24 I asked you, do you know whether the NMTV Board has any  
25 committees and your answer was no.

1           A     I would stand corrected, sir.

2           Q     Sure, and I'd also asked you whether the by-laws  
3 authorized any committees and your answer was no, so does that  
4 refresh your recollection?

5           A     Yeah, I would stand corrected on that part.

6           Q     Sure, and pursuant to the by-laws, do you know who  
7 the officers of the corporation -- I don't mean the names of  
8 the persons, but the titles are supposed to be?

9           A     There is supposed to be president, vice president  
10 and secretary.

11          Q     Howard, would you mind showing the witness a copy of  
12 the by-laws? Thank you. Pastor, Mr. Topel is going to put in  
13 front of you Article 5, Section 1 of the by-laws and I'd like  
14 you to just, if you would, would you read into the record the  
15 first sentence?

16          A     Article --

17          Q     Article 5, Subsection 1, would you read the first  
18 sentence there? Can I help you find that?

19          A     No, I think I can find --

20               JUDGE CHACHKIN: Would you help him out?

21               MR. TOPEL: Have we identified the exhibit?

22               MR. COHEN: It's -- Your Honor, it's --

23               JUDGE CHACHKIN: Well, what the witness has in front  
24 of him is TBF Exhibit 101, Tab D. Which -- what are you  
25 looking for now?

1 MR. COHEN: I'm looking for the Section 1, officer  
2 -- the very first sentence.

3 MR. HILL: Okay. The officers of the corporation  
4 shall be president, a secretary and a chief financial officer.

5 BY MR. COHEN:

6 Q Now, did you know until this moment, sir, that the  
7 -- that those who -- that those are the officers of NMTV  
8 pursuant to its by-laws?

9 A Yes, the term chief financial officer, to my  
10 knowledge, has always been associated with the office of  
11 secretary.

12 MR. COHEN: Very well, sir. Thank you, that's all I  
13 have right now.

14 MR. TOPEL: I see.

15 BY MR. COHEN:

16 Q Okay, now, I want to ask you a question, Pastor,  
17 about the procedure or the process concerning board meetings  
18 at NMTV. First, give me your best recollection as to how many  
19 board meetings you've attended since you became a director up  
20 until today.

21 A Now, would you include by conference calls also?

22 Q Well, I know the minutes reflect a conference call  
23 board meeting.

24 A Yeah.

25 Q And I would say -- but for purposes of my question,

1 any meeting where minutes were taken and there were minutes  
2 taken, sir.

3 A Yeah, I --

4 Q The meeting that you're referring to so I would  
5 include that for purposes of answering my question.

6 A I would suggest eight to ten.

7 Q Eight to ten. Now -- and those are meetings where  
8 minutes were taken.

9 A Yes.

10 Q Now, are you -- can you tell me based on your own  
11 personal knowledge who took the minutes at those meetings?

12 A Jane Duff.

13 Q And did Mr. Juggert take any of the minutes or did  
14 Jane Duff take the minutes?

15 A I've never known him to be asked to take nor did I  
16 observe him taking minutes per se.

17 Q So at the eight to ten meetings that you attended,  
18 Jane Duff took all the minutes.

19 A Yes.

20 Q Now, after the minutes were taken by Jane Duff, do  
21 you recall ever receiving a copy of the minutes in draft form  
22 before she signed them, draft form for your review?

23 A Not before she signed them, no.

24 Q And after she signed them, then were they mailed to  
25 you or did you review the minutes at the next board meeting?

1           A     I reviewed the minutes at the next board meeting  
2 unless it was board meetings that I missed and they were  
3 mailed to me for consent.

4           Q     But the ordinary practice would be not to send you  
5 the minutes for you to review them at the next meeting.

6           A     Next board meeting.

7           Q     Now, am I correct that of the eight to ten meetings  
8 that you recall attending, that Mr. Juggert was --     A     I  
9 don't recall a meeting other than by phone and he was not  
10 identified by being on the phone, that Mr. Juggert was not  
11 present.

12          Q     Thank you. And what was your understanding, sir, as  
13 to the role that Mr. Juggert was playing at these board  
14 meetings?

15          A     To assist MTV, I mean, Minority Television, in  
16 whatever way possible that he would be called upon to help  
17 guide us in legal matters.

18          Q     Thank you. Because you looked upon him as your  
19 legal advisor, as NMTV's legal advisor, is that --

20          A     Yes, I did.

21          Q     And you still look upon him in that capacity.

22          A     Yes, I do.

23          Q     And you've asked Mr -- .you've spoken to Mr.  
24 Juggert, to your mind -- in your mind as counsel for NMTV,  
25 correct, and your con -- you've had conversations with him

1 where you looked upon his as NMTV's lawyer, is that correct?

2 A Yes, in the meetings.

3 Q In the meetings.

4 A Yes, may I --

5 Q In the meetings -- yes, did you want to add  
6 something?

7 A Yes.

8 Q Okay.

9 A Yes, I don't only -- no only him but Mr. Cole --

10 Q Colby May.

11 A -- Colby May, yes.

12 Q Yes, yes, I understand and that's helpful. Now, you  
13 also have spoken to Mr. Juggert on the telephone, haven't you,  
14 of course?

15 A Yes, I have.

16 Q Okay, and you were speaking to him then about NMTV  
17 business I take it.

18 A Yes, I was.

19 Q Now, you don't know who NMT -- strike that. You  
20 don't know who NMTV's accountants are, do you?

21 A No, I don't.

22 Q You don't know the name of the accounting firm.

23 A Wait a minute, let me back up, let -- could I strike  
24 that?

25 Q Sure.

1           A     I know that they are the same accountants of TBN. I  
2 have heard the name -- I've heard their names because their  
3 names sound something like a tire company or something -- I'm  
4 sorry.

5           Q     You're --

6           A     I've heard their name, I can't -- I'm sorry, I'm not  
7 good at names.

8           Q     But you know that, that they're Trinity's  
9 accountants.

10          A     They're Trinity's accountant --

11          Q     Yes.

12          A     -- and if I could think a while I could come up with  
13 their name.

14          Q     No, that's fine.

15          A     Yeah.

16          Q     And you don't know who hired them to represent NMTV,  
17 do you?

18          A     No, I don't know.

19          Q     And you don't know what the terms of their  
20 employment are?

21          A     No, I don't.

22          Q     And you don't know anything about how they're  
23 compensated, do you?

24          A     No, I don't.

25          Q     And you don't know who they send their bills to, do

1 you?

2 A No, I don't. May I have a word at that point?

3 Q Well, no, Mr. -- let me tell you --

4 A Okay.

5 Q -- and Your Honor can correct me if I'm wrong, but  
6 under the procedure, Mr. Topel will have the chance to ask you  
7 questions --

8 A Oh, I see, all right.

9 Q And you will have every opportunity --

10 A Thank you, sir.

11 Q And you don't know who gets copies of everything, do  
12 you?

13 A No, I don't.

14 Q But you don't get copies --

15 A No, I don't.

16 Q Now, I wanted to ask you a few questions about Jane  
17 Duff and Paul Crouch. Do you know if she receives any income  
18 from NMTV?

19 A None to my knowledge.

20 Q Well, at the time of your deposition, you had no  
21 knowledge on that matter, am I correct?

22 A As I said, none to my knowledge.

23 Q You have no knowledge on that issue.

24 A I have no knowledge on that issue, it is --

25 Q She may receive income or she may not receive



1 income.

2 A It has never come before any minutes or the budget  
3 or anything where she was included as a compen -- as a person  
4 receiving compensation and I wouldn't have knowledge beyond  
5 that which was printed.

6 Q And do you know if Paul Crouch receives any income  
7 from NMTV?

8 A None to my knowledge.

9 Q It's the same answer, you have no knowledge.

10 A I have no knowledge that they do.

11 Q They do or they don't.

12 A I have no knowledge that they do.

13 Q So you have any knowledge as to whether Jane Duff  
14 receives income -- strike that question, strike that. Now, I  
15 want to return to a different matter, Pastor, if I could. Do  
16 you recall there came a time that, as a board member, you were  
17 -- you participated in either a discussion or more than one  
18 discussion concerning the question of whether there was a  
19 conflict of interest insofar as the law firms were concerned  
20 that were representing NMTV and Trinity?

21 A Yes.

22 Q And that was discussed at board meetings, right?

23 A Yes.

24 Q Was it discussed at more than one board meeting?

25 A Yes.